

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**  
(Northern Division)

ALFRED CHESTNUT, *et al.*,

Plaintiffs,

v.

DONALD KINCAID, *et al.*,

Defendants.

Civil Action No. LKG-20-2342

**PLAINTIFFS' UNOPPOSED MOTION  
FOR LEAVE TO DEPOSE INCARCERATED INDIVIDUAL**

Plaintiffs Alfred Chestnut, Andrew Stewart, and Ransom Watkins move for leave to depose Edward Capers, who is presently incarcerated in Hagerstown, Maryland at Maryland Correctional Training Center. Because Mr. Capers is incarcerated, Rule 30(a)(2)(B) requires Plaintiffs to seek leave to depose him. Plaintiffs are entitled to depose Mr. Capers, who was an important witness in their underlying criminal trial in 1984. Given that Plaintiffs' claims in the current action center on the alleged coercion of witnesses who testified against them, the deposition is necessary and relevant to the instant action. Mr. Capers will suffer no injury or other prejudice by giving deposition testimony like any other party to civil litigation. Counsel for the Individual Defendants and for BPD have indicated that they do not oppose this Motion.

Accordingly, Plaintiffs respectfully request the Court grant them leave to depose Mr. Capers.

Dated: October 5, 2021

Respectfully submitted,

/s/

---

Kobie A. Flowers (Bar No. 16511)  
kflowers@browngold.com  
Andrew D. Freeman (Bar No. 03867)  
adf@browngold.com  
Neel K. Lalchandani (Bar No. 20291)  
nkl@browngold.com  
Chelsea J. Crawford (Bar No. 19155)  
ccrawford@browngold.com  
Anthony J. May (Bar No. 20301)  
amay@browngold.com  
Brown, Goldstein & Levy, LLP  
120 E. Baltimore Street, Suite 2500  
Baltimore, Maryland 21201  
Tel: (410) 962-1030  
Fax: (410) 385-0869

*Attorneys for Plaintiffs Alfred Chestnut,  
Andrew Stewart, Jr., and Ransom Watkins*

/s/

---

Larry A. Nathans (Bar No. 03023)  
nathans@nathanslaw.com  
Booth M. Ripke (Bar No. 25764)  
bripke@nathanslaw.com  
Nathans & Biddle LLP  
120 E. Baltimore Street, Suite 1800  
Baltimore, Maryland 21201  
Tel: (410) 783-0272  
Fax: (410) 783-0518

*Attorneys for Plaintiffs Andrew Stewart, Jr.  
and Ransom Watkins*